

GEOGHAN COHEN & BONGIORNO, LLC
 ATTORNEYS AT LAW

250 Mineola Boulevard
 Mineola, N.Y. 11501

STEVEN E. COHEN*
 JOSEPH R. BONGIORNO*
 MARIS C. SATTELY*
 SAMANTHA A. NICLAS*

(516) 741-2405
 (212) 465-0600
 (212) 753-8901
 FAX: (212) 753-0960

OF COUNSEL
 RONALD F. TUTRONE*

WILLIAM F.X. GEOGHAN, JR.
 1918-2000

*ADMITTED TO N.Y. & N.J.

E-mail: GCBESQ@AOL.COM

September 9, 2010

VIA E-Filing

Magistrate Judge Andrew L. Carter
 United States District Court for the
 Eastern District of New York
 225 Cadman Plaza East
 Brooklyn, NY 11201

Re: Marek Lukasiewicz vs. ARC, et als.
 09cv05130-FB-ALC

Dear Honorable Sir:

Under the terms of the initial conference questionnaire submitted by the parties, expert reports would have to be served by October 10, 2010.

We have requested and still not received the type of blanket which was utilized by our client, Marek Lukasiewicz, at the time he was injured in the subject accident. Briefly, Mr. Lukasiewicz was involved in a CPR program run by the Red Cross. We allege that he was injured as he attempted to get off the type of blanket which was utilized at that time as it was slippery on the tile floor. Our client suffered a rotator cuff tear to the right shoulder requiring surgery. The allegations are that this blanket was dangerous for the purpose for which it was used.

Without the blanket at this point, it would be difficult if not impossible to have an appropriate safety expert exam same, provide us with an opinion and report within the time prescribed by the aforementioned conference questionnaire.

Given the foregoing, it is respectfully requested that an extension be provided as follows:

Dates for plaintiff's expert reports: From October 10, 2010 to December 10, 2010

Dates for defendant's expert reports: From December 10, 2010 to February 10, 2011

Date for completion of expert discovery: From January 1, 2011 to March 31, 2011

Dates for filing dispositive motions: All parties by May 20, 2011

Very truly yours,

JOSEPH R. BONGIORNO

JRB:vvh

cc: Caryn M. Silverman, Esq. – VIA E-mail and Regular Mail
Sedgwick Deter Moran & Arnold LLP